



SEXUAL HARASSMENT POLICY


SCOPE AND PURPOSE OF THE POLICY

GEWS Ltd is committed to maintaining a workplace free from sexual harassment. Sexual harassment is a form of workplace discrimination. All employees are required to work in a manner that prevents sexual harassment in the workplace. This Policy is one component of GEWS Ltd's commitment to a discrimination-free work environment. Sexual harassment is against the law, and all employees have a legal right to a workplace free from sexual harassment and employees are urged to report sexual harassment by filing a complaint internally.

1. GEWS'S COMMITMENT

- 1.1 GEWS welcomes diversity and believes that every employee has a right to work in an environment which encourages harmonious relationships. GEWS is committed to preventing harassment & bullying and it is the responsibility of all managers to make sure that their employees are aware of and understand the context of GEWS's Harassment & Bullying Policy.
- 1.2 Every manager at GEWS should aim to promote a working environment in which harassment and bullying cannot flourish. They should take immediate action if harassment and/or bullying is suspected or identified, whether or not a complaint had been made. Allegations of harassment and bullying received either formally or informally through this policy must be taken seriously and dealt with promptly and sensitively.
- 1.3 In addition to its commitment to equal opportunity, GEWS has a legal obligation to ensure that harassment on the grounds of someone's race, sex, disability, sexual orientation, gender identity, religion or belief, age or harassment on any other grounds, does not take place at work, as this is discrimination. In addition, GEWS has a duty of care towards its employees under the Health and Safety Act 1974.
- 1.4 Every member of employees is also personally liable under the legislation, see footnote Allegations of harassment & bullying will be treated very seriously by GEWS and could result in disciplinary action being taken against the perpetrator. GEWS will ensure that any member of employees raising a concern under this policy is not victimised as a result.
- 1.5 As allegations of harassment & bullying are very serious, GEWS will also treat very seriously any such allegations proven to be malicious and these are also likely to be the subject of disciplinary action.

2. WHAT IS SEXUAL HARASSMENT

DOCUMENT NO.	AUTHORISED BY	PAGE	DATE	ISSUE
GEWSMS-17		1 of 9	17/02/2026	1



2.1 Sexual harassment is a form of sex discrimination and is unlawful under UK law. Sexual harassment includes harassment based on sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender. Harassment is unwanted conduct which has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment, and in the perception of the recipient of the conduct, it should reasonably be considered as having that purpose or effect.

Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual's sex when:

- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment, even if the reporting individual is not the intended target of the sexual harassment;
- Such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual's employment.

A sexually harassing hostile work environment includes, but is not limited to, words, signs, jokes, pranks, intimidation or physical violence which are of a sexual nature, or which are directed at an individual because of that individual's sex. Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, which cause the recipient discomfort or humiliation, which interfere with the recipient's job performance.

Some of the most prevalent forms of harassment & bullying include the following:

- Sexual harassment can take the form of ridicule, sexually provocative remarks or jokes, offensive comments about dress or appearance, the display or distribution of sexually explicit material, unwelcome sexual advances or physical contact, demands for sexual favors or assault.
- Harassment on the grounds of a person's sexual orientation may be aimed at heterosexual people but is more usually experienced by gay men and lesbians, bisexual men and women. Examples of harassment relating to sexual orientation are homophobic remarks or jokes, offensive comments relating to a person's sexual orientation, threats to disclose a person's sexual orientation to others or offensive behaviour/abuse relating to HIV or AIDS status. The European Commission code of practice on sexual harassment points out that lesbians and gay men often encounter disproportionate levels of harassment relating to their sexual orientation. The response of lesbians and gay men to harassment may also be complicated by the fact that in order to complain about it or confront it, they may have to be open about their sexual orientation with work colleagues (perhaps for the first time).

DOCUMENT NO.	AUTHORISED BY	PAGE	DATE	ISSUE
GEWSMS-17		2 of 9	17/02/2026	1



- Harassment on the grounds of gender identity may be aimed at transgender people, or people who have undergone, are undergoing, or intend to undergo gender reassignment. It is recognised that this is a separate issue unrelated to sexual orientation. It is unlawful to discriminate against or harass anyone on these grounds under the Sex Discrimination (Gender Reassignment) Regulations 1999.

Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favours. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment.

Any employee who feels harassed should report so that any violation of this policy can be corrected promptly. Any harassing conduct, even a single incident, can be addressed under this policy.

3. SEXUAL HARASSMENT - GENERAL PRINCIPLES

- 3.1 The over-riding principles in dealing with allegations or concerns of sexual harassment are that they must be taken seriously, considered carefully and addressed speedily and where possible, in confidence.
- 3.2 An employee who feels that (s)he is the subject of sexual harassment (either by a colleague, or anyone else whom they come into contact within the course of their work) may wish to make a note of incidents, dates, times and any witnesses, for future reference. Any member of employees who considers themselves to have been the subject of harassment has the right to be listened to and to be given informed advice on how the matter may be resolved.

There are usually a number of options. Anyone who feels they have been harassed is likely to wish to speak to someone with whom they feel they share something in common. For this reason, they should be able to approach one of a number of different people within GEWS (see section 5.1 below).

- 3.3 Should sexual harassment occur in a group situation, the person in authority within the group has the responsibility to recognise harassment when it occurs and to take speedy action to stop it. It is important that it is made clear to the perpetrator that such behaviour is unacceptable at GEWS and will not be tolerated. Silence or inaction can be seen as collusion and endorsement of such behaviour. If the person in authority is the harasser, others within the group should support the individual being harassed in taking action to report the harassment.

DOCUMENT NO.	AUTHORISED BY	PAGE	DATE	ISSUE
GEWSMS-17		3 of 9	17/02/2026	1



4. HOW WILL ALLEGATIONS OF SEXUAL HARASSMENT BE DEALT WITH?

4.1 In the event that a member of employees considers that they are experiencing sexual harassment they have a number of options open to them. They may be able to speak directly to the individual concerned or to write to him/her expressing their concerns and requesting that the harassing behaviour stop immediately. Alternatively, (or subsequently if they achieve no success) they may wish to talk to someone in order to obtain another perspective on the situation and to ensure that someone else knows about it and can take action with them to ensure that it stops. A final option is to make a formal complaint.

5. THE INFORMAL APPROACH


5.1 Members of employees wishing to seek advice or discuss concerns about sexual harassment may approach, their line manager or another manager within GEWS managers, will receive briefing on the implementation of this policy and training will be provided. It is acknowledged that some members of employees may wish to seek either informal or formal advice from their trade union representative.

5.2 Anyone approached by a member of employees who wishes to discuss the matter informally should

- find a quiet place to discuss the issue confidentially and without interruption.

- listen carefully to what they are being told and ensure that they understand the full facts.

- When they are sure they understand and if they feel confident to do so, they should discuss the options open to the individual.

DOCUMENT NO.	AUTHORISED BY	PAGE	DATE	ISSUE
GEWSMS-17		4 of 9	17/02/2026	1



- 5.3 Confidentiality is very important in dealing with cases of alleged sexual harassment as experience shows that they will be much more difficult to resolve informally if information about the matter becomes common knowledge. Anyone approaching a manager for advice may however wish to be accompanied by a work colleague.
- 5.4 If after having been approached, a Harassment Advisor or manager wishes to seek advice on how to deal with an alleged case of sexual harassment they should seek the agreement of the person who has confided in them to that course of action. Harassment Advisors or managers in such circumstances may consult their departmental Human Resources contact. If the Harassment Advisor does not feel able to advise in a particular case they should explain the reasons to the person who has approached them and refer them to another advisor
- 5.5 Having heard the facts about the incident and the context of the action or behaviour that caused concern, there are a number of informal options available to the individual to resolve the matter. For example the person who has experienced sexual harassment could talk to the individual on his/her own, or with a colleague accompanying him/her. The purpose of the conversation would be to make the respondent aware of the way his/her behaviour has been perceived and ask him/her not to repeat it. Alternatively, the manager could facilitate a meeting between both parties to give the complainant the opportunity to talk to the respondent and explain his/her view of the offending behaviour. Normally, the Harassment Advisor or manager advising should not take action following an informal approach concerning harassment, without the agreement of the individual concerned.
- 5.6 In some cases, both parties may wish to refer themselves for mediation.
- 5.7 The action outlined above will be appropriate in many cases and will often be sufficient to resolve the matter. Where it is possible to resolve the matter by informal means, every effort should be made to do so and as swiftly as possible. A formal complaint should only be submitted as a 'final option', where the informal approach has not achieved satisfactory results, or in exceptional circumstances where the nature of the incident(s) warrants a more formal approach.
- 5.8 If an informal approach has failed or is inappropriate, a formal complaint can be made in writing to the manager in charge, Complaints about a manager in charge should be made to GEWS managing director and complaints about the managing director should be made to the CEO
- 5.9 Employees who consider that they have experienced harassment from employees can seek advice from employees Harassment Advisors. If the matter is not resolved informally to the satisfaction of the complainant, a formal complaint should be made in writing to the managing director.

DOCUMENT NO.	AUTHORISED BY	PAGE	DATE	ISSUE
GEWSMS-17		5 of 9	17/02/2026	1



6. A FORMAL COMPLAINT

- 6.1 Once it has been established that the issue has not been resolved, a formal complaint must be registered in writing as soon as possible, with the Head of department (or more senior manager if appropriate, see paragraph 5.8). A formal complaint of sexual harassment should include the nature of the complaint, with reference to dates, times and places (where possible) in relation to a specific incident(s) and any (unsuccessful) efforts to resolve the matter. The names of any witness(es) to the incident(s) should also be included. Witnesses can request anonymity and this will be granted if appropriate, but this is not encouraged in the interests of openness and 'natural justice'.
- 6.2 While the formal complaint is under investigation, an alternative location, or timetable for the work of the complainant will be considered where requested (although there can be no guarantees that an alternative location can always be found). Where it is necessary to facilitate ongoing professional relations between the two parties, other possibilities such as an embargo on one to one meetings between the parties, or meetings without a third party present should be considered and facilitated by the line manager and Head of Department.

7. INVESTIGATING A FORMAL COMPLAINT

- 7.1 On receipt, a formal complaint of sexual harassment should be forwarded under confidential cover to Human Resources. S/he will consult with the managing director and where informal approaches have failed or the nature of the allegation warrants a formal investigation will convene an Investigatory Panel to examine the matter within the time frames set out below. Where there has been no attempt to resolve the matter informally, the complainant may be asked to follow an informal route to resolution before a formal panel is convened.

The Chair of the panel should take responsibility for ensuring the meetings take place within the agreed timeframe.

Process	Timeframe
Register of formal complaint	As soon as possible after the incident
Formal acknowledgement /receipt of complaint by HR	Within 5 working days of receipt of formal complaint by HR
Respondent notified in writing by HR of complaint and date set for written response. Complainant given a copy.	Within 5 working days of receipt of formal complaint
HR set up investigatory panel and agree date of hearing from the outset	Within 10 days of receipt of formal complaint
Notification to all parties of date of hearing	Within 10 days of receipt of formal complaint
All written submissions to panel, complainant and	Not less than 7 calendar days before the

DOCUMENT NO.	AUTHORISED BY	PAGE	DATE	ISSUE
GEWSMS-17		6 of 9	17/02/2026	1



respondent	hearing
Pre meeting briefing for investigatory panel	Within one week of receipt of written submissions by panel
First meeting of panel	Within one month of being appointed
Panel decision in writing to chair of CEO and Director of HR	Within 5 working days of the last panel meeting
If case upheld, Chair of CEO and manager of HR determine what action needs to be taken	Within 5 working days of receipt of the investigatory panel report
Outcome of investigatory panel and action to be taken conveyed in writing to respondent,	Within 7 calendar days of decision regarding action to be taken
Outcome of investigatory panel conveyed in writing to complainant and heads of department where appropriate	Within 7 calendar days of decision regarding action to be taken
Witnesses informed in writing when investigation is complete and if case upheld	Within 7 calendar days of decision regarding action to be taken
N.B. Exceptionally, timescales may not be adhered to, or there may be delays through GEWS closure, or absence of one of the parties etc.	In exceptional circumstances, HR will write to all parties with a revised timetable as soon as possible.

7.2 The Panel of 3 will include a senior manager nominated by the managing director who will chair the meetings and a member of the CEO. A representative of the Human Resources Division will advise the panel. No member of the Panel should be from the department in which the complainant, the respondent or any of the witnesses work and the panel should reflect a varied profile in terms of race, gender, disability and sexual orientation wherever possible.

7.3 Guidance notes are attached to this policy to ensure maximum transparency of process for all those involved in the investigation of a formal complaint. A briefing on harassment and bullying will take place at the first pre meeting of each formal investigation panel. The Human Resources Division will ensure that the respondent is informed in writing of the complaint made against him/her and will ensure that all those attending a meeting of the Investigatory Panel are given sufficient notice in writing. Anyone required to attend an Investigatory Panel meeting may be accompanied by a trade union representative or work colleague. The complainant will have access to the respondent's submission or responses and any witness statements.

DOCUMENT NO.	AUTHORISED BY	PAGE	DATE	ISSUE
GEWSMS-17		7 of 9	17/02/2026	1



- 7.4 It is important to safeguard confidentiality that none of the parties to the complaint should discuss it with others, including members of the Panel outside the investigatory hearing, unless there is a legitimate reason for them to do so i.e. in order to be able to respond to an allegation, investigate and take action.
- 7.5 The respondent can seek support from their Trades Union or the Employee Assistance programme and can seek procedural advice from the HR Consultancy team. Should the respondent and complainant both seek advice on the process from the same HR professional the HR professional will refer them to another colleague in HR explaining the reason.
- 7.6 A complaint of harassment may involve matters that are distressing or personal and which the complainant may find difficult to discuss in detail. The Chair of the Panel will therefore conduct its meeting(s) with the utmost sensitivity. A written record of the meeting(s) will be made, which may be presented as evidence to any subsequent disciplinary hearing.
- 7.7 The role of the Panel will be to interview the complainant, the respondent and any other relevant people such as named witnesses and to produce a report of its investigation outlining any proposals for action resulting from the Panel's findings. In the event that there has been action which could be perceived as retaliation, or victimisation since the complaint was made, this will be considered by the Panel in the course of their investigation. Formal notes of the meeting will be made. The report will be submitted under confidential cover to the managing director who in conjunction with the manager of Human Resources will determine what action if any, needs to be taken. Where a formal complaint is upheld, action will be taken in all cases irrespective of the seniority or status of the respondent. The record of the meetings of Investigatory Panels will be stored confidentially in the Human Resources Division and will not be integrated with any individual's personal record file.
- 7.8 Where an allegation is of a serious nature amounting to gross misconduct under the Disciplinary Procedure relevant to the member of employees concerned, consideration will be given to immediate action under that procedure, which may include suspension of the respondent from work in accordance with agreed procedures. The procedures set out in this document do not inhibit any action that may be taken under GEWS's Disciplinary Procedures.
- 7.9 The manager of Human Resources will convey the outcome of an Investigatory Panel meeting in writing to the complainant, respondent and the relevant Head(s) of department where appropriate and will explain any actions resulting from it. Where appropriate, training and/or counselling will be offered to the offender to assist him/her in understanding how to avoid repeating the offending behaviour. Counselling will also be offered to the complainant.
- 7.10 Following a formal harassment complaint, either party may be concerned about working with the other again. Due regard of such views should be taken into account when offering

DOCUMENT NO.	AUTHORISED BY	PAGE	DATE	ISSUE
GEWSMS-17		8 of 9	17/02/2026	1



counselling or mediation and a transfer of one or both parties to another section, department or location may be appropriate in some cases. Where an Investigatory Panel confirms a complaint of harassment, the transfer of the complainant would only take place with his/her agreement.

- 7.11 If either the complainant or the respondent feels that a formal investigation of a harassment complaint involving them has not been dealt with to their satisfaction, they may raise their concerns via the appropriate Grievance procedure.
- 7.12 Where a complaint of harassment and bullying has been upheld and disciplinary action is taken against the respondent, the managing director with advice from HR, should monitor the situation, to make sure there is no repeat in the offending behaviour and/or victimisation and/or lack of management, or support for the former complainant.
- 7.13 Following a finding of harassment or bullying any repeat behaviour of this type will result in disciplinary action.

8. MONITORING OF THE POLICY

- 8.1 The managing director will keep the implementation of this policy under review and will monitor its use annually.

9. USE OF NON-DISCRIMINATORY LANGUAGE

- 9.1 GEWS has developed guidelines on the use of non-discriminatory language which are aimed at assisting employees to ensure that their language does not exclude, patronize or offend.

SIGNED: Gwil Thomas

POSITION: Director of Compliance, Regulation, Health & Safety

DATE: 17 February 2026

DOCUMENT NO.	AUTHORISED BY	PAGE	DATE	ISSUE
GEWSMS-17		9 of 9	17/02/2026	1